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FILED
IN COUNTY CLERK'S OFFICE

AUG 31 2022

PIERCE COUNTY, WASHINGTON
CONSTANCE R. WHITE, County Clerk
BY DEPUTY

Superior Court of Washington, County of Pierce

Eric Watson and Sarah Watson,

Plaintiff(s),

v.

Lisa Kurtz and David Kurtz,

Defendant(s).

No. 22 2 08513 0

COMPLAINT FOR

defamation of character

I, Eric Watson And Sarah Watson, the plaintiff in this case ("Plaintiff")
allege the following:

I. **Jurisdiction.** This Court has jurisdiction to hear this matter because:



Original Jurisdiction. This matter is brought before the Court under its
authority of original jurisdiction as indicated in RCW 2.08.010. This matter is
one of the types of matters discussed in RCW 2.08.010.

OR



Other Statute. This matter is brought before the Court to be heard under the
authority indicated in . This matter is one of the types of
matters discussed in that statute.

II. **Venue.** This Court is an appropriate venue to hear this matter because:

COMPLAINT 
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Name: Eric & Sarah Watson
Address: 7807 Kapowsin Hwy E Graham, WA 98338
Phone: 253-380-0720

- (1) Plaintiff is a resident of Pierce County County, in the State of Washington.
- (2) Defendant is a resident of Clark County, in the State of Washington.
- (3) Plaintiff has made the choice to bring this matter to this Court, rather than a court in a different county or state, for the reason(s) provided below:

The offence took place in Pierce County

III. Background Facts. Plaintiff has provided a short and plain statement of the facts needed to establish the claims made in this Complaint in the numbered paragraphs below:

- (1) Lisa claims Eric Watson convinced his mother to live with him. This is NOT TRUE. Marie Watson called Eric and asked to live with Eric and his family because she need family
- (2) Lisa Kurtz indicates Eric Watson "quickly drained the m for his personal benefit. How would Lisa know by reading bank records. Marie Watson was witness 29/365
- (3) Lisa claims Eric Watson used Marie Watson's money to buy the property. True but Marie Watson wanted her name and Eric's name on the property so when she passed it's Eric's
- (4) Lisa claims Eric used the bank accounts of Marie Watson as his own. Not true. Mom would talk over every transaction before any purchase was spent.
- (5) Lisa claims Eric made care payments to himself. These were discussions Marie Watson and Eric made each month.



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- (6) Lisa says Eric made a reimbursement for 6000.00 for a
CHRISTMAS PRESENT ON 1-12-2019, I HAVE NO IDEA WHAT
SHE IS TALKING ABOUT.
SEE ATTACHMENT A

IV. Claims & Causes of Action. Plaintiff has identified each claim being brought in this Complaint by the type of claim it is, and identified the cause of action for that claim, in the numbered list below:

- (1) This is a claim for: \$10,000,000.00 for Eric Watson
 The cause of this claim is: DEFAMATION OF CHARACTER by claiming
THE FALSE ALLEGATIONS ARE TRUE
- (2) This is a claim for: \$10,000,000.00 for Sarah Watson
 The cause of this claim is: DEFAMATION OF CHARACTER by claiming
SARAH had pushed Marie Watson down CAUSING INJURY
- (3) This is a claim for: _____
 The cause of this claim is: _____

V. Damages. Plaintiff has sustained the following damages due to Defendant's conduct. The amount of damages may be unknown at this time and will be established at the time of trial. These damages are of the type(s) listed below:

Type of Damages

MENTAL & EMOTIONAL ^{DISTRESS} DEFAMING ERIC'S CHARACTER CAUSING
SO MUCH STRESS IT CAUSED HIS MOUTH TO SWELL & GUMS TURN
BLACK IT HAD TO BE TAKEN CARE OF IN GOOD SAMARITAN
HOSPITAL. I CLAIM \$10,000,000.00 IN DAMAGES

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VI. Request for Relief. Plaintiff requests that the Court enter a judgement against Defendant as follows:

- (1) \$10,000,000.00 For Eric Watson for damages compensating for false allegations
- (2) To REMOVE Lisa Kurtz from the Probate Executive position of the estate and any inheritance from Marie Watson's estate
- (3) \$10,000,000.00 For Sarah Watson for damages compensating for false allegations
- (4) _____
- (5) Awarding Plaintiff any further or additional relief which the Court finds equitable, appropriate, or just.

Dated August 31, _____, 20 22.

Submitted by:

Eric Watson Sarah Watson
Signature of Plaintiff

Eric & Sarah Watson
Printed Name of Plaintiff

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Attachment A

- 7 Lisa claims Eric paid himself \$15,000 to take care of his Mother more than one occasion.
- 8 Lisa claims we lived on Marie Watson's property. Eric Watson owns this property as Marie Watson bought the house & land for him. Eric has lived there for 22+ years. Marie Watson and Harold Watson on May 27th, 2000 drove Eric to the house and said it's all yours.
- 9 Lisa states Eric used Marie's money to pay virtually all their expenses without written consent. Lisa visits Marie 4 times in 4 years having zero knowledge of Marie's arthritis. What can you expect a 91 year old lady to do at 91. Handwrite a book?
- 10 Lisa claims Eric bought a boat for 30,000.00. I have no idea where Lisa comes up with this. She can not provide a photo or ~~see~~ any facts to support it. Not even a name, VIN number or something.
- 11 Lisa claims Eric did not have authority to hire an attorney, at Marie Watson's approval for the damages done to the boat by shipper. Marie Watson stopped the attorney at 20,000.00 so Eric fixed her.

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12 Lisa claims Eric did not have permission from his mother to spend 20,000.00 on the Yacht Marie approved, and the 18,000.00 expenses to ship the boat from San Diego CA to Washington. This was all discussed before the boat was purchased again. How can a 91 year old lady write when she has arthritis.

13 Lisa claims Eric paid for his own Cruise ship tour of Alaska. Marie Watson asked for it to happen as she and the rest of the family enjoyed it. Lisa is very jealous of this

14 Lisa claims Eric roamed around town making unauthorized purchases exceeding 50,000.00.
Ok, what town?

15 Lisa claims Eric made unauthorized cash withdrawals from Marie's POA account. Marie Watson was with us and would ask to stop at a cash machine so she had cash on hand, when Mom ran out we would do it again.

16 Lisa claims Eric selected himself to be the other individual with the right of survivorship. This was done with an attorney, my mother present and Marie did not indicate any other family to inherit on both properties.

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17. Lisa claims Both Benbow and Thompson Road were made without express authorization. How can they say this. They were not there. They have zero facts to support that statement.

18. Lisa claims Eric Watson never took any action or disputed charges to Marie Watson's accounts. Eric in fact contacted Wells Fargo about several charges on her account into which over 2000.00 was returned.

19. Lisa claims Eric improperly influenced his 89 year old mother to quit claim deed the 12821 Holtz Rd property to him individually. This property was discussed clear and thought out by Marie Watson to be signed over to Eric. We have a 45 minute recording showing Marie Watson clearly wanted the property to go to Eric Watson. To further the action Marie Watson went into US Bank and freely signed the Notary Book as well as the quit claim deed.

20. Lisa claims Eric stole at least 134,120.00 from Marie for care payments. Claiming there is no admissible evidence of an agreement to provide care nor is Eric qualified to provide care.

This was a verbal agreement before Marie moved and after. Good Samaritan Hospital even furthered this with their release of Marie into his care.

This shows that Lisa has no family connections with Marie, Eric or Jerry. To express such harsh allegations by using bank statements as facts to support her claims.

1. From August 2016 till MARIE'S DEATH ON 12-13-2020 LISA VISITED MARIE 4 TIMES. TWO TIMES SHE STATED, WE WERE ON OUR WAY THROUGH. THE OTHER TWO TIMES WAS THE FINAL DAYS OF MARIE'S LIFE. WHERE LISA WAS MORE INTERESTED IN THE VALUES OF THE SILVERWARE, PICTURES AND OTHER.

3. IN RETALIATION SHE CALLED ADULT PROTECTIVE SERVICES.
WHEN THE COMPLAINT WAS UNFOUNDED SHE TALKED TO
JAMIE FAIRMAN & VANESSA OLMSTEAD AND THEY CALLED

4. Mom Thought, who's going to carry for me? Mark
she gave a chance and he ~~took her~~ ^{dumped her off} at her
~~Arizona house. Jumpin asked me~~ ^{Arizona house. Jumpin asked me}
~~and attempt to get her~~ ^{and attempt to get her}

5. 4 years The cops kept coming, APS kept knocking and Mom was tired of it. She died from a broken heart the hospital said.

22. Enclosed is a police report. This is the date MARIE
LEFT her ARIZONA home. Reporting her JEWELRY STOLEN.
MARIE AT THIS TIME COULD HAVE STATED TO THE OFFICER
ANY DISCOMFORT IN MOVING TO WASHINGTON. LISA CLAIMS
MARIE WENT AGAINST HER WILL, OR WAS FORCED

23. LISA CLAIMS MARIE WAS TRAPPED in her home.
LISA VISITED 4 TIMES in 4 years. NEVER ASKED if
she could care for her some would have a break.
So what FACTS DOES LISA COME UP WITH TO PROVIDE
PROOF. A good imagination